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14	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
15		del of California	
16			
10	TWITTER, INC.,	Case No. 14-cv-4480-YGR	
17		Case No. 14-cv-4480-YGR	
	TWITTER, INC., Plaintiff,))	
17		DEFENDANTS' UNOPPOSED	
17 18	Plaintiff, v.	DEFENDANTS' UNOPPOSED ADMINISTRATIVE MOTION FOR AN EXTENSION OF TIME TO	
17 18 19	Plaintiff,	DEFENDANTS' UNOPPOSED ADMINISTRATIVE MOTION FOR AN EXTENSION OF TIME TO FILE THEIR OPPOSITION TO PLAINTIFF'S MOTION	
17 18 19 20	Plaintiff, v. WILLIAM P. BARR, Attorney General of the United States, et al.,	DEFENDANTS' UNOPPOSED ADMINISTRATIVE MOTION FOR AN EXTENSION OF TIME TO FILE THEIR OPPOSITION TO PLAINTIFF'S MOTION CHALLENGING PRIVILEGE	
17 18 19 20 21	Plaintiff, v. WILLIAM P. BARR, Attorney	DEFENDANTS' UNOPPOSED ADMINISTRATIVE MOTION FOR AN EXTENSION OF TIME TO FILE THEIR OPPOSITION TO PLAINTIFF'S MOTION CHALLENGING PRIVILEGE DESIGNATIONS	
17 18 19 20 21 22	Plaintiff, v. WILLIAM P. BARR, Attorney General of the United States, <i>et al.</i> , Defendants.	DEFENDANTS' UNOPPOSED ADMINISTRATIVE MOTION FOR AN EXTENSION OF TIME TO FILE THEIR OPPOSITION TO PLAINTIFF'S MOTION CHALLENGING PRIVILEGE DESIGNATIONS Hon. Yvonne Gonzalez Rogers	
17 18 19 20 21 22 23	Plaintiff, v. WILLIAM P. BARR, Attorney General of the United States, <i>et al.</i> , Defendants. Pursuant to Local Rules 6-3 and 7-11, Defendence	DEFENDANTS' UNOPPOSED ADMINISTRATIVE MOTION FOR AN EXTENSION OF TIME TO FILE THEIR OPPOSITION TO PLAINTIFF'S MOTION CHALLENGING PRIVILEGE DESIGNATIONS Hon. Yvonne Gonzalez Rogers lants hereby move for a four-day extension	
17 18 19 20 21 22 23 24	Plaintiff, v. WILLIAM P. BARR, Attorney General of the United States, et al., Defendants. Pursuant to Local Rules 6-3 and 7-11, Defendence of time, from Monday February 25 to Friday, March	DEFENDANTS' UNOPPOSED ADMINISTRATIVE MOTION FOR AN EXTENSION OF TIME TO FILE THEIR OPPOSITION TO PLAINTIFF'S MOTION CHALLENGING PRIVILEGE DESIGNATIONS Hon. Yvonne Gonzalez Rogers lants hereby move for a four-day extension 1, 2019, to file their opposition to Plaintiffs'	
17 18 19 20 21 22 23 24 25	Plaintiff, v. WILLIAM P. BARR, Attorney General of the United States, <i>et al.</i> , Defendants. Pursuant to Local Rules 6-3 and 7-11, Defendence	DEFENDANTS' UNOPPOSED ADMINISTRATIVE MOTION FOR AN EXTENSION OF TIME TO FILE THEIR OPPOSITION TO PLAINTIFF'S MOTION CHALLENGING PRIVILEGE DESIGNATIONS Hon. Yvonne Gonzalez Rogers lants hereby move for a four-day extension 1, 2019, to file their opposition to Plaintiffs'	

Dated: February 25, 2019

At the time that the parties were negotiating their proposed schedule to brief this motion, Defendants advised Plaintiffs' counsel that in light of the backlog of work that had accumulated during the government shutdown, a February 25, 2019 deadline already would be very difficult to meet given the amount of work and level of coordination needed to complete a response. Since that time, additional factors have set back Defendant's ability to meet that deadline.

First, the Government's ability to complete work on their opposition has been hindered by weather events on two coasts. A large snowstorm in Washington State last week rendered Defendants' key client contact for the FBI, who is based in Seattle, unreachable for several days before a long-planned family trip, and a short extension is needed to complete discussions with that official before the filing date. Another snowstorm in Washington, D.C. on February 20, which resulted in some officials working remotely from home, has also hindered work needed to complete the Government's opposition.

Moreover, in opposing Plaintiff's motion the Government expects to assert the deliberative process privilege. As this Court is aware, the deliberative process privilege must be asserted by a senior government official, and consequently requires coordination and review at senior levels of responsible government agencies. *See Landry v. FDIC*, 204 F.3d 1125, 1135 (D.C. Cir. 2000). The Government has worked diligently to complete this process, but additional time is needed to coordinate and finalize any deliberative process privilege assertions.

For the foregoing reasons, Defendants respectfully request a four-day extension of their deadline to oppose Plaintiffs' Motion, from Monday, February 25 to Friday, March 1, 2019, and a commensurate extension of Plaintiff's reply deadline. Twitter's counsel has indicated to Defendants that they do not object to the Government's request for a 4 day extension, provided that Twitter is given an extension of 4 days for its reply. Both parties jointly request to maintain the current hearing date of April 2, 2019 at 2:00 p.m.

Respectfully submitted,

JOSEPH H. HUNT

Assistant Attorney General

DAVID L. ANDERSON

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United States Attorney 1 ANTHONY J. COPPOLINO 2 Deputy Branch Director 3 /s/ Christopher R. Healy 4 CHRISTOPHER HEALY 5 Trial Attorney, DC Bar No. 219460 6 JULIA A. HEIMAN Senior Counsel 7 U.S. Department of Justice Civil Division, Federal Programs Branch 8 P.O. Box 883 9 Washington, D.C. 20044 christopher.healy@usdoj.gov 10 Attorneys for Defendants 11 * * * * * 12 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the facts within the 13 foregoing are true and correct. 14 Executed this 20th day of September, 2018. 15 16 17 /s/ Christopher R. Healy 18 CHRISTOPHER R. HEALY 19 20 21 22 23 24 25 26 27 28

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)	
14	TWITTER, INC.,	Case No. 14-cv-4480-YGR	
15	Disintiff)	
16	Plaintiff,	<i>)</i>)	
17	v.)	
	REFERGOND GEGGIONG HILLS 1944		
18	JEFFERSON B. SESSIONS, III, United States Attorney General, et al.,		
19	Thursday General, et al.,)	
20	Defendants.	[PROPOSED] ORDER	
)	
21			
22			
23	The Court, having considered Defendants' Administrative Motion to Extend Time for		
24	Defendants to Respond to Plaintiff's Motion Challenging Privilege Assertions, hereby ORDERS		
25	that the Defendants' Motion is GRANTED . IT IS HEREBY ORDERED the deadlines set forth		
26	in the Court's Order, ECF No. 270, are amended as follows:		
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28			
	Twitter, Inc. v. Sessions, et al., Case No. 14-cv-4480-YGR		
	1 [PROPOSED] ORDER		

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1	a. Defendants' opposition to Twitter's Privilege Motion shall be due March 1, 2019;
2	b. Twitter's reply in support of its Privilege Motion shall be due March 18, 2019;
3	b. I writer's repry in support of its I fivinege wotton shall be due water 16, 2017,
4	c. The hearing on Twitter's Privilege Motion shall remain set for April 2, 2019, at 2:00
5	p.m.
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7	
8	IT IS SO ORDERED , this day of, 2018.
9	
10	Dated:
11	HON. YVONNE GONZALEZ ROGERS
12	UNITED STATES DISTRICT JUDGE
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Twitter, Inc. v. Sessions, et al., Case No. 14-cv-4480-YGR